



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

June 14, 2019
Via ETFS Filing

Talk America Services, LLC
10802 Executive Center Drive Benton Building Suite 300
Little Rock, Arkansas 72211

FRN: 0023997349
Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

RE: Talk America Services, LLC
Application to Discontinue Service

Dear Ms. Dortch:

Enclosed for filing please find the Application to Discontinue Service submitted on behalf of Talk America Services, LLC. This filing is made pursuant to Title 47, Section 63.71 to notify the Commission of the Company's intent to discontinue the provision of exchange access and interstate long distance services to certain residential customers in certain locations in the states of Delaware, Georgia, Michigan, and Ohio.

A copy of this filing has been provided to the Service List provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant

cc: Talk America - Talk America Services
tms: FCCx1905

Enclosures
ST/cc

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Section 63.71 Application of)
Talk America Services, LLC)
to Discontinue Services)

File No. _____

Section 63.71 Application of Talk America Services, LLC

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and interstate long distance services in certain locations in the states of Delaware, Georgia, Michigan and Ohio. This proposed discontinuance will affect approximately 339 existing customers.¹

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

1. Name and corporate headquarters address of Carrier

Talk America Services, LLC
10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, AR 72211

2. Correspondence concerning this Application should be sent to:

Sharon Thomas
Consultant to Talk America Services, LLC
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stthomas@inteserra.com

¹ Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or about August 1, 2019, pending required federal and state regulatory approval of the discontinuance.

4. *Points of Geographic Areas of Service Affected:*

The services that are the subject of this discontinuance will be discontinued in certain locations in the states of Delaware, Georgia, Michigan and Ohio. The Applicant does NOT intend to discontinue service to all locations in these states, however, and will continue to offer service where the facilities of its underlying carriers allow.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

Talk America Services proposes to discontinue local exchange service, including exchange access; DSL internet access; and intrastate and interstate long distance services provided to approximately 3 residential customers in Delaware, 147 residential customers in Georgia, 188 residential customers in Michigan and one residential customer in Ohio. The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance.

The services are being discontinued because Talk America Services' wholesale service providers in the affected service locations, which are competitive local exchange carrier affiliates of Windstream Services, LLC, intend to decommission certain equipment that is used to serve the affected customers. Talk America Services operates as a reseller of the Windstream affiliates' services and has no ability to provide the same bundle of services to the impacted customers. As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via 1st class U.S. mail to all affected customers on June 14, 2019. The notice is attached as Exhibit A.

A copy of this Application is being sent to the state regulatory commissions and governors' offices in

Delaware, Georgia, Michigan and Ohio, as well as to the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

Conclusion

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 14th day of June, 2019.

By: /s/ Jeffrey R. Strenkowski

Jeffrey R. Strenkowski
Vice President, Deputy General Counsel of
Governmental Affairs
Talk America Services, LLC

Sharon Thomas, Consultant to
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stthomas@inteserra.com

Exhibit A
Customer Notice



2134 W Laburnum Ave.
Richmond, VA 23227

Customer Name
Customer Address
City, State Zip

June 15, 2019

URGENT: Your telephone services will be impacted unless you take action!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and long distance services in certain areas within the states of Delaware, Georgia, Michigan and Ohio on or after August 1, 2019, pending applicable regulatory approvals, due to the decommissioning of equipment by our wholesale service provider. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services toll free at 1-800-962-4772 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider and could result in a complete loss of your dialtone, internet access and long distance services, including your telephone number, with no short-term ability to restore them. You will need to migrate your telephone service to an alternative provider **before August 1, 2019**. You may find information about alternative providers in your local telephone directory.

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,

Talk America Services, LLC

Exhibit B – Service List

Ms. Donna Nickerson, Executive Secretary
Delaware Public Service Commission
861 Silver Lake Boulevard
Suite 100
Dover, DE 19904

Governor John Carney
Carvel State Office Building
820 N. French Street, 12th Floor
Wilmington, DE 19801

Mr. Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street S.W.
Atlanta, GA 30334-9052

Office of the Governor
206 Washington Street
111 State Capitol
Atlanta, GA 30334

Ms. Robin Anconda
Director, Telecommunications Division
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

Governor Gretchen Whitmer
P.O. Box 30013
Lansing, Michigan 48909

Ms. Tonawa Troupe, Acting Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Governor Mike DeWine
Riffe Center
30th Floor
77 South High Street
Columbus, OH 43215-6117

U.S. Department of Defense
Pentagon
Attn. Special Assistant for Telecom.
Washington, DC 20301

CERTIFICATE OF SERVICE

STATE OF FLORIDA)

COUNTY OF ORANGE)

On this date, June 14, 2019, the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid and/or via overnight delivery to the service list contained in Exhibit B.

/s/Keith Rice

For Shipping Department
Inteserra Consulting Group, Inc.